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NOV 22 1988

CERTIFIED MAIL--
RETURN RECEIPT REQUESTED

Bruce Jernigan
 Browning Ferris Industries
 P.O. Box 3151
 Houston, TX 77253

Re: SCP-Carlstadt Site

Dear Mr. Jernigan:

Attached you will find EPA's required changes to Dames & Moore's proposed Revisions to the Project Operations Plan (POP), Numbers 8 and 9. Prior to initiation of field work, Dames & Moore must certify, in writing, that the modifications will be implemented.

It is my understanding that you have now secured access to all of the off-site properties necessary to implement the proposed work. Accordingly, EPA expects that field work will be initiated within two weeks of your receipt of these changes.

EPA approval of the work outlined in POP Revisions 8 and 9 does not constitute a modification to the requirement that the on-site, source control Feasibility Study (FS) be completed by April 1, 1989. The work outlined in the POP Revisions is not necessary for completion of the on-site, source control FS; this work constitutes the first phase of the second operable unit for the SCP site.

If you have any questions regarding the attached modifications, please contact Janet Feldstein or James Schmidtberger, of my staff at (212)264-2646.

Sincerely yours,

Raymond Basso, Acting Chief
 Site Compliance Branch

Attachment

cc: Thomas Armstrong, General Electric
 William L Warren, Esq.
 Pamela Lange, NJDEP
 Gerard Coscia, Dames & Moore

bcc: Jim Schmidtberger, ERRD-SCB
 Jim Rooney, ORC-NJSUP
 Rick Schwarz, ERRD-NNJCS

D:SCB:NNJCS:FELDSTEIN:11/28/88

CONCURRENCES

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OL	NNJCS	ORC	NNJCS	SCB			
AME	FELDSTEIN	ROONEY	KATZ	RAYMOND BASSO			
	<i>JP 8/1/88</i>	<i>8/1/88</i>	<i>8/1/88</i>	<i>8/1/88</i>			

EPA Changes to POP Revision 8

- 7.15.5.3 Screens should be set in the till aquifer, and should not extend into the Bedrock. Backfilling may be required.
- 7.15.5.4 The well screens must also be constructed of stainless steel. The cement/Bentonite mix will be the same as that specified in POP Revision No. 1.

Any well installed in a manhole must have a watertight flush-mount locking cap, in addition to the watertight locking manhole.
- 7.15.5.5 All cuttings and fluids generated should be stored on site for future analyses/disposal. Most of the wells will be installed in paved areas; it will therefore not be possible to rake the cuttings into the ground. All fluids generated will be assumed to be contaminated, due to groundwater contamination on site, and therefore must be disposed of appropriately.
- 7.15.5.8 Wells should be developed until water is free of fines and suspended solids.
- 7.15.5.9 Ten to twenty percent of the water level measurements should be confirmed using a steel tape or measure.
- 7.15.9.1 Analytical method, container, preservation, and holding time requirements must be detailed for sulfates.
- 7.15.9.6 Equipment decontamination procedure should include wrapping in aluminum foil (shiny side out) after air drying.

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EPA Changes to POP Revision 9

7.16.1 The objective should include determination of the soil quality in the till.

7.16.6.4 All monitoring well casings and screens located in the water table must be constructed on stainless steel. The cement/Bentonite mix will be the same as that specified in POP Revision No. 1.

Schedule 40 material will be used for wells extending below 50 feet.

All cuttings and fluids generated should be stored on site for future analyses/disposal. All fluids generated will be assumed to be contaminated, due to groundwater contamination on site, and therefore must be disposed of appropriately.

7.16.6.6 The frequency of soil samples collected for chemical analyses must be specified. Dames & Moore will be collecting 8 soil samples from the till.

7.16.6.7 Wells should be developed until the water is free of fines and suspended solids.

An eight hour pump test may not be sufficient to give reliable results. A 24-hour test should be conducted. Water levels in at least three water table aquifer wells should be measured during the pump test, as well. EPA recommends that the pump test be conducted after the installation of the off-site wells, so that the water levels in these wells can also be monitored.

7.16.10.1 Analytical method, container, preservation, and holding time requirements must be detailed for sulfates.

7.16.10.9 The equipment decontamination procedure should include wrapping in aluminum foil (shiny side out) after air drying.